

March 13, 2015

Freedom of Information Officer
U.S. EPA Region 5 (MI-9J)
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: *FOIA Request for Information*

To Whom It May Concern:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), I write to request materials submitted to EPA pursuant to Consent Decrees entered in the following five matters:

- *United States v. INEOS USA LLC*, filed in the United States District Court for the Northern District of Ohio, Civil Action No. 3:12-cv-01404
- *United States v. INEOS ABS (USA) Corporation et al*, filed in the United States District Court for the Southern District of Ohio, Civil Action No. 1:09-cv-545
- *United States v. SABIC Innovative Plastics US LLC et al*, filed in the United States District Court for the Southern District of Indiana, Civil Action No. 3:12-cv-76
- *United States v. The Dow Chemical Co.*, filed in the United States District Court for the Eastern District of Michigan, Civil Action No. 1:11-cv-13330
- *United States v. Vertellus Agriculture & Nutrition Specialties LLC*, filed in the United States District Court for the Southern District of Indiana, Civil Action No. 1:09-cv-1030

Specifically, regarding *United States v. INEOS USA LLC*, I seek (1) all LDAR Program Plans required under Section V.B, ¶¶ 14–15 of the Consent Decree; and (2) all Compliance Status Reports required under Section VII.

Specifically, regarding *United States v. INEOS ABS (USA) Corporation et al*, I seek (1) all LDAR Program Plans required under ¶ 3 of Appendix A to the Consent Decree; and (2) all Reports required under Section VII of the Consent Decree, including all quarterly and semi-annual reports specified by ¶ 50.

Specifically, regarding *United States v. SABIC Innovative Plastics US LLC et al*, I seek (1) all Facility-Wide LDAR Documents required under ¶ 14 of the Consent Decree; and (2) all ELP Compliance Status Reports required under Section VIII.

Specifically, regarding *United States v. The Dow Chemical Co.*, I seek (1) all Facility-Wide LDAR Documents required under ¶ 14 of the Consent Decree; and (2) all ELP Compliance Status Reports required under Section VI.

Specifically, regarding *United States v. Vertellus Agriculture & Nutrition Specialties LLC*, I seek (1) all Facility-Wide LDAR Documents required under ¶ 14 of the Consent Decree; and (2) all Compliance Status Reports required under Section VII.

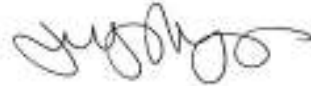
I am willing to pay use fees incurred and assessed for the search and copying of the records responsive to our complete request up to the amount of \$500.00. I would prefer to accept the requested records via the most expeditious means, whether that be paper, fax or electronic copy.

If all or any part of this request is denied, I request a written statement of the grounds for the denial. If you determine that some portions of the requested records are exempt from disclosure, please provide me with the non-exempt portions that can be disclosed.

I look forward to receiving the requested materials promptly. If you have any questions, please contact me at (301) 279-9697 or via e-mail at jrandazzo@historyassociates.com.

Thank you for your assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jennifer Randazzo", with a stylized flourish at the end.

Jennifer Randazzo
Historian

Enclosures